

LAW OFFICES
WESTON, GARROU & MOONEY
A LEGAL PARTNERSHIP

JOHN H. WESTON
(1944-2020)
G. RANDALL GARROU^{1*}
JEROME H. MOONEY^{1, 40}
MARK P. BINDER^{1‡}
REBEKAH FRUSHTICK^{1, 2, 3}

12121 WILSHIRE BOULEVARD
SUITE 525
LOS ANGELES, CALIFORNIA 90025
FAX (310) 442-0899
(310) 442-0072

SALT LAKE CITY
50 WEST BROADWAY
SUITE 300
SALT LAKE CITY, UT 84101-2006
(801) 364-5635

¹ ADMITTED IN CALIFORNIA
² ADMITTED IN ILLINOIS
³ ADMITTED IN NORTH CAROLINA
⁴ ADMITTED IN UTAH

*OF COUNSEL
[†] A CALIFORNIA PROFESSIONAL CORPORATION
[‡] A UTAH PROFESSIONAL CORPORATION

April 13, 2023

Hon. Lewis J. Liman, U.S.D.J.
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Notice of Errata:

689 Eatery Corp., etc. et ano. v. City of New York, et al., Docket No. 02 CV 4431 (LJL) ("Action No. 1")

59 Murray Enterprises, Inc. etc., et ano. v. City of New York, et al., Docket No. 02 CV 4432 (LJL) ("Action No. 2")

Club at 60th Street, et al. v. City of New York, Docket No. 02 CV 8333 (LJL) ("Action No. 3")

336 LLC, etc, et al. v. City of New York, Docket No. 18 CV 3732 (LJL) ("Action No. 4")

Dear Judge Liman:

I, along with Jerome Mooney, represent the plaintiffs in Action No. 3 above, and write on behalf of the plaintiffs in all four actions to bring to your Honor's attention technical errors in a recently filed document inadvertently caused by our office which we just discovered. The technical problem is in the document filed by the plaintiffs in all four actions on March 27, 2023, entitled "Club Plaintiffs' Joint Memorandum of Law in Support of their Alternative Cross Motion for Summary Judgment and Response In Opposition to City's Motion For Summary Judgment."

Specifically, this was our firm's first attempt at providing hyperlinks for the

LAW OFFICES
WESTON, GARROU & MOONEY
A LEGAL PARTNERSHIP

Hon. L. Liman

Re: Notice of Errata
April 13, 2023
Page 2

citations in a brief to documents previously filed on the ECF system and, in that regard, we just found that a few of those hyperlinks unfortunately linked to a different document than the one to which we'd intended they be linked. Specifically, although all the *citations* in the document are accurate, and the vast majority of the hyperlinks to those citations are accurate, the following hyperlinks should be ignored as they link to the wrong document:

On ECF Page 70 (Doc. Page 61), the hyperlink for **JSF ¶ 93**

On ECF Page 71 (Doc. Page 62), the hyperlinks for **JSF ¶¶ 89 and 90 and 94**

On ECF Page 72 (Doc. Page 63), the hyperlinks for **JSF ¶¶ 70-72**

On ECF Page 81 (Doc. Page 72), the hyperlinks for **JSF ¶¶ 89-90, 93 and 94**

On ECF Page 82 (Doc. Page 73), the hyperlinks for **JSF ¶¶ 100, 101, 102 and 103**

On ECF Page 83 (Doc. Page 74), the hyperlink for **JSF ¶ 106**

On ECF Page 85 (Doc. Page 76), the two references in fn. 66 to the pages from the 2022 Berzak PSJ Declaration link to the wrong document.

We apologize for any inconvenience or confusion we may have caused.

Very truly yours,

WESTON, GARROU & MOONEY

By: /s/ G. Randall Garrou
G. Randall Garrou